

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

| | | |
|-----------------------------------|---|-------------------------|
| MICHAEL AVENATTI, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | C.A. No. 20-cv-01541-SB |
| |) | |
| FOX NEWS NETWORK, LLC, a Delaware |) | |
| Limited Liability Company; SEAN |) | |
| HANNITY; LAURA INGRAHAM; MARIA |) | |
| BARTIROMO; HOWARD KURTZ; |) | |
| SHANNON BREAM; BRET BAIER; TRISH |) | |
| REGAN; RAYMOND ARROYO; JON |) | |
| SCOTT; LELAND VITTERT; and |) | |
| JONATHAN HUNT, |) | |
| |) | |
| Defendants. |) | |

**JOINT STIPULATION AND [PROPOSED] SCHEDULING ORDER
REGARDING BRIEFING OF DEFENDANTS' MOTION TO DISMISS,
MOTION TO STRIKE AND MOTIONS FOR JUDICIAL NOTICE**

Plaintiff Michael Avenatti and all named Defendants hereby stipulate and agree as follows:

WHEREAS, on March 3, 2021, Defendants filed a Motion to Dismiss the Amended Complaint and their Opening Brief and Transmittal Declaration in support thereof ("Motion to Dismiss") (D.I. Nos. 11-13);

WHEREAS, also on March 3, 2021, Defendants filed a Motion to Strike Amended Complaint Pursuant to California Code of Civil Procedure § 425.16 and their Opening Brief and Transmittal Declaration in support thereof ("Motion to Strike") (D.I. Nos. 15-17); and

WHEREAS, Defendants intend to file motions requesting that the Court take judicial notice of certain documents submitted in connection with the Motion to Dismiss and Motion to Strike (the "Requests for Judicial Notice" and, together with the Motion to Dismiss and Motion to Strike, the "Pending Motions");

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the parties, through the undersigned counsel, subject to the approval of the Court, as follows:

1. Defendants shall file the Requests for Judicial Notice on or before June 15, 2021.
2. Plaintiff shall respond to the Pending Motions on or before July 5, 2021.
3. Defendants shall file their replies in further support of the Pending Motions on or before August 5, 2021.

SEITZ, VAN OGTROP & GREEN, P.A.

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June 9, 2021

SO ORDERED, this ____ day of _____, 2021

The Honorable Stephanos Bibas
United States Circuit Judge